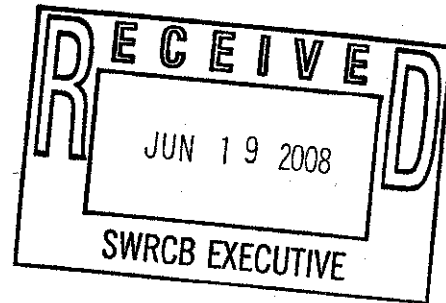


June 19, 2008

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Electronically Submitted and FAX Delivered

Subject: Proposed Strategic Plan Update: 2008-2012, Version Three
City of Roseville Comments

Dear Jeanine Townsend:

Thank you for the opportunity to provide comment in response to the above subject document (Proposed Plan). Overall we support the State Water Boards goals and objectives within the Proposed Plan. We are however concerned with the action steps that have been developed, particularly in the area of consistency. Our concerns are stated herein.

The Proposed Plan has identified two objectives and seven action steps in support of increasing consistency amongst the State and Regional Boards. While we applaud this effort, we are uncertain how Action 6.2.1 achieves this. Action 6.2.1 states:

"Reissue the statewide storm water permit for Phase II municipal separate storm water systems (MS4s) by July 2009 that updates the baseline for consistency in the municipal storm water permitting program (the permit should provide a consistent approach for issues that have been raised regarding the Phase I MS4s, including hydromodification and the use of numeric benchmarks, action limits or effluent limitations). As appropriate solutions developed in reissuing the Phase II permit should be used in Phase I permits around the state in subsequent years. Phase II MS4s serve a population of 100,000 or less that are located in an urbanized area."

Across the Nation, the Phase II stormwater program is in its infancy having only completed one permit cycle; this in comparison to Phase I MS4 programs which have been implementing stormwater programs for well over 15 years. In fact, across the State there are still many Phase II programs that have yet to be issued their first permit. In some cases it is our belief the delay in permit issuance for many Phase II MS4s may be directly or in-directly due to inconsistent review of Stormwater Management Plans amongst Regional Boards. We are aware that one Regional Board in particular is requesting Phase II MS4s to implement best management practices that go well beyond the current Phase II permit requirements. As such we do support the goal of establishing consistency amongst Regional Boards. This however should be developed by establishing a state-wide stormwater policy rather than the creation of policy through permits. Creation of policy through permits in our mind is analogous to shooting a target by the "ready-fire-aim" method. In most attempts one will miss the mark.

We strongly oppose the idea of using the Phase II MS4 General Permit as the mechanism for creating this much-needed state-wide policy on stormwater issues. The California Stormwater Quality Association and other MS4s have been requesting the State Board take the lead in establishing a stormwater policy for some time. It is difficult for one to imagine how the complex issues associated with hydromodification, numeric benchmarks and action limits can be addressed in a one year time frame given the goal of reissuing the Phase II permit by July 2009. As you well know, these issues were recently broached within the state-wide general construction permit, which has taken several years to draft and is still yet to be adopted. A delay in the Phase II MS4 permit will only continue the delay in moving permitted programs forward. The focus for the new Phase II permit should be on enhancing current program elements and establishing clear objectives with meaningful measurable goals and performance-based management.

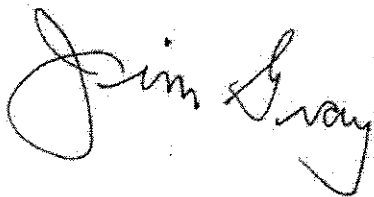
Recommendations

In closing we offer the following suggestion:

- Revise Action 6.2.1 to reflect the goal of establishing a state-wide stormwater policy that provides clear direction to Regional Boards in the development of individual MS4 permits, establishes review criteria for Phase II Stormwater Management Plans that meet the intent of the Phase II general permit and federal regulations. The policy should also address the complex issues associated with hydromodification on a state-wide basis, and provide direction as to the appropriate use of numeric benchmarks, action levels and effluent limitations. The state-wide policy should build upon the results and recommendations contained within the Stormwater Blue Ribbon Panel Report entitled *"The Feasibility of Numeric Effluent Limits Applicable to Discharges of Stormwater Associated with Municipal, Industrial and Construction Activities"* completed in 2006.

Thank you for your consideration of our comments. Should you have any questions regarding this letter, please contact Kelye McKinney at (916) 774-5552.

Sincerely,

A handwritten signature in cursive script that reads "Jim Gray".

Jim Gray
Mayor, City of Roseville